

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

CONTOUR IP HOLDING, LLC and
ION WORLDWIDE, INC.,

Plaintiffs,

v.

GOPRO, INC.,

Defendant.

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) C.A. No. 15-1108 (LPS) (CJB)
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)

**DECLARATION OF ALISA LEUNG IN SUPPORT OF GOPRO, INC.'S
MOTION TO TRANSFER VENUE TO THE NORTHERN DISTRICT OF
CALIFORNIA, OR IN THE ALTERNATIVE, TO THE DISTRICT OF UTAH**

MORRIS, NICHOLS, ARSHT & TUNNELL
LLP

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November 22, 2016

I, Alisa Leung, hereby declare as follows:

1. I am employed as a Director, Financial Planning and Analysis, at GoPro, Inc. (“GoPro”) at its principal place of business located in San Mateo, California. I have been employed by GoPro since July 2011. In this capacity, I have personal knowledge of the facts set forth herein.

2. GoPro is a corporation with its principal executive offices located at 3000 Clearview Way, San Mateo, California 94402. GoPro has approximately 1786 employees who are primarily located in San Mateo, California, San Francisco, California, and San Diego, California, and a number of whom are outside the United States (approximately 482 or so of the 1786 employees). GoPro was originally incorporated in California in 2004 under another name, and has maintained its principal offices in California throughout its existence.

3. GoPro does not have any offices or other facility located in Delaware.

4. I understand that Plaintiff Contour IP Holding LLC (“CIPH”) has filed the above-captioned patent infringement lawsuit against GoPro, Inc. I further understand that CIPH has alleged that certain GoPro products, including at least the HERO3, HERO3+ and HERO4 cameras (“cameras with wireless capability”) infringe certain CIPH patents (the “accused products”).

5. None of GoPro’s accused products are designed or developed in Delaware. GoPro’s products, including any digital video cameras, are primarily designed and developed in San Mateo, California, where GoPro’s research and development, product development, sales and finance operations are located. To the best of my knowledge, any potentially relevant documents and things in GoPro’s possession that relate to its accused products are located at its

offices in San Mateo, California. Specifically, technical documents concerning the structure, function and operation of aspects of GoPro's accused products would be located at GoPro's San Mateo offices. Financial and sales documents relating to GoPro's accused products would also be located at GoPro's San Mateo offices.

6. To the extent GoPro is required to produce any sales, financial or technical witnesses in connection with this litigation, all of GoPro's known prospective witnesses are located in San Mateo, California. Specifically, GoPro's presently anticipated witnesses, include myself and Ganesh Thonse, Vice President and member of the Engineering team. I have knowledge of finance and sales relating to the accused products, and I work at GoPro's San Mateo offices and live in the San Francisco Bay Area. Mr. Thonse has knowledge of the structure, function and operation of GoPro's accused products, who is located in the San Francisco Bay Area and works at GoPro's San Mateo, California offices.

7. I am unaware of any potential GoPro witnesses for this litigation who live in, work in, or are otherwise based in Delaware.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 18 day of November 2016.

By: 
Alisa Leung, Declarant

CERTIFICATE OF SERVICE

I hereby certify that on November 22, 2016, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on November 22, 2016, upon the following in the manner indicated:

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